

CSD 1181 [08/28/14]

Name, Address, Telephone No. &amp; I.D. No.

CURRY ADVISORS, A Professional Law Corporation

K. Todd Curry (149360)

525 B Street, Ste. 1500

San Diego, CA 92101

Tel: (619) 238-0004 | Fax: (619) 238-0006

Counsel for Debtor / Debtor In Possession Tierra Del Rey, LLC

## UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF CALIFORNIA

325 West "F" Street, San Diego, California 92101-6991

In Re

TIERRA DEL REY, LLC

BANKRUPTCY NO. 15-04253-LT11

Tax I.D. (EIN) #: \_\_\_\_\_ /S.S.#:XXX-XX-\_\_\_\_\_ Debtor.

## NOTICE OF HEARING AND MOTION

TO THE DEBTOR, ALL CREDITORS AND OTHER PARTIES IN INTEREST:

**YOU ARE HEREBY NOTIFIED** that on December 17, 2015, at 10:00 a.m., in Department 3, Room 129, of the Jacob Weinberger United States Courthouse, located at 325 West "F" Street, San Diego, California 92101-6991, there will be a hearing regarding the Motion of Tierra Del Rey, LLC, for [check the appropriate box]:

- Dismissal of a chapter 7, 11 or 12 case;
- Conversion of a chapter 7, 11 or 12 case by a party other than the debtor;
- Allowance of [interim] [final] compensation or reimbursement of expenses of professionals as provided in Exhibit "A" [information required by Federal Rule of Bankruptcy Procedure 2002(c)(2)];
- Appointment of a trustee in a chapter 11 case; or
- Other [specify the nature of the matter]:

To extend by 120 days the exclusive periods during which only the Debtor may file and confirm a plan of reorganization.

If not required to be attached, a set of the moving papers will be provided, upon request, by the undersigned or may be inspected at the office of the Clerk.

Any opposition or other response to the motion must be served upon the undersigned and the original and one copy of such papers with proof of service must be filed with the Clerk of the U.S. Bankruptcy Court at 325 West "F" St., San Diego, California 92101-6991, NOT LATER THAN FOURTEEN (14)<sup>1</sup> DAYS FROM THE DATE OF SERVICE.

DATED: October 27, 2015

/s/ K. Todd Curry  
[Attorney for] Moving Party

<sup>1</sup>If you were served electronically or by mail, you have three (3) additional days to take the above-stated actions as calculated by Fed. R. Bankr. P. 9006(f).

**CERTIFICATE OF SERVICE**

I, the undersigned whose address appears below, certify:

That I am, and at all times hereinafter mentioned was, more than 18 years of age;

That on 27th day of October, I served a true copy of the within NOTICE OF MOTION AND HEARING by [describe here mode of service]

U.S. MAIL AND ECF--SEPARATE PROOF OF SERVICE FILED WITH THE COURT

on the following persons [set forth name and address of each person served] and/or as checked below:

[ ] Attorney for Debtor (if required):

SEE SEPARATE PROOF OF SERVICE FILED WITH THE COURT

[ ] For Chpt. 7, 11, & 12 cases: [ ] For ODD numbered Chapter 13 cases: [ ] For EVEN numbered Chapter 13 cases:  
  
UNITED STATES TRUSTEE THOMAS H. BILLINGSLEA, JR., TRUSTEE DAVID L. SKELTON, TRUSTEE  
Department of Justice 401 West "A" Street, Suite 1680 525 "B" Street, Suite 1430  
402 West Broadway, Suite 600 San Diego, CA 92101 San Diego, CA 92101-4507  
San Diego, CA 92101

I certify under penalty of perjury that the foregoing is true and correct.

Executed on 10/27/2015  
(Date)

/s/ K. Todd Curry  
(Typed Name and Signature)

525 B Street, Ste. 1500  
(Address)

San Diego, CA 92101  
(City, State, ZIP Code)